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**UNITED STATES BANKRUPTCY COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

In Re:

Case No. 19-30088-DM

PG&E CORPORATION and PACIFIC  
GAS & ELECTRIC COMPANY

Debtors

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric  
☒ Affects Both Debtors

**AMENDED REPLY OF CLAIMANTS  
REPRESENTED BY THE WAGNER  
LAW GROUP IN SUPPORT OF  
MOTION TO FILE SUPPLEMENTAL  
CLAIMS AGAINST PG&E**

Abrams' motion and PGE's opposition raise the prospect of thousands of claimants filing supplements to claims alleging wrongful manipulation of stock values by PGE in the years running up to the bankruptcy plan.

This prospect is very real. So far, counsel representing about 2,000 claimants have filed formal joinders, with others waiting in the wings. The possibility of filing supplements to claims against PGE is of active concern to thousands of claimants. Once our investigation is complete, we will make an informed decision on the merits whether to file claims supplements. In the meantime, we do not want any ruling on the Abrams' motion to prejudice the rights of other claimants.

1 PGE's opposition ignores two important facts. The first is the value of the stock  
2 transferred by PGE to the Trust in mid-2020 was \$2.1 billion short of the \$6.75 billion  
3 promised in the Restructuring Support Agreement and the Plan. As a result, no claimant will  
4 receive full compensation for their loss.

5 Secondly, PGE has stipulated, and this Court has approved the stipulation, to permit  
6 hedge fund Baupost to do exactly what the joining fire victims now propose to do without  
7 the necessity of a motion, permit these claimants to file a supplement to their claims alleging  
8 serial misstatements by PGE from 2015 through the confirmation of the Plan that artificially  
9 increased the value of the stock in the runup to Plan confirmation, resulting in a dramatic  
10 loss of value when the misstatements were publicly exposed. These claimants will then seek  
11 damages directly from PGE, not the Trust. As stated in the stipulation, PGE may retain all  
12 of its defenses.

13 There is not good reason to deny thousands of claimants the same rights in this regard  
14 as Baupost.

15 Otherwise, these joining claimants support Mr. Abrams' motion to have his claim  
16 supplemented deemed timely by the Court.

17 March 21, 2023

/s/ Nicholas J.P. Wagner  
Nicholas J.P. Wagner